

Pro Se 1 2022

ELANA CARLAN & ANGELA NGUYEN

AT WARNER MUSIC MOVE PLANS TO STEAL  
RECORD LABEL MONEY AFTER SIGNING FOR

CORTZ JONES - FORGED SIGNATURE  
AT SUB POP

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

RECORDS

CORTZ DAUNDRE JONES

Plaintiff(s),

v.

WARNER  
MUSIC

Defendant(s).

CASE NO. 2:23-W-01424-TL  
[to be filled in by Clerk's Office]

COMPLAINT FOR A CIVIL CASE

Jury Trial: ☒ Yes ☐ No

WONG FAMILY  
ROBBED W/  
WARNER MUSIC

FILED  
LODGED

ENTERED  
RECEIVED

SEP 12 2023

RE

I. THE PARTIES TO THIS COMPLAINT

BY

AT SEATTLE  
CLERK U.S. DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
DEPUTY

A. Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

CORTZ DAUNDRE JONES

Street Address

City and County

SEATTLE KING COUNTY

State and Zip Code

WA 98101

Telephone Number

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## B. Defendant(s)

*Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.*

## Defendant No. 1

Name

WARNER MUSIC GROUP

Job or Title (if known)

Street Address

City and County

State and Zip Code

Telephone Number

## Defendant No. 2

Name

ELANA CAPLAN

Job or Title (if known)

Street Address

City and County

State and Zip Code

Telephone Number

## Defendant No. 3

Name

ANGELA CAPLAN

Job or Title (if known)

Street Address

City and County

State and Zip Code

Telephone Number

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Defendant No. 4

Name

Job or Title (*if known*)

Street Address

City and County

State and Zip Code

Telephone Number

**II. BASIS FOR JURISDICTION**

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? (*select all that apply*)

Federal question:

If checked complete section A.



Diversity of citizenship:

If checked complete section B.

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case. *Attach additional pages if needed.*

- 470 RACKETEERING - ROBBERY VIA  
DELOD  
LABEL

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B. If the Basis for Jurisdiction Is Diversity of Citizenship

1. The Plaintiff(s)

a. If the plaintiff is an individual.

The plaintiff (name) CORTES DAVIDE JAMES, is a citizen of the  
State of (name) \_\_\_\_\_.

b. If the plaintiff is a corporation.

The plaintiff, (name) \_\_\_\_\_, is incorporated under  
the laws of the State of (name) \_\_\_\_\_, and has its principal  
place of business in the State of (name) \_\_\_\_\_.

*(If more than one plaintiff is named in the complaint, attach an additional page providing  
the same information for each additional plaintiff.)*

2. The Defendant(s)

a. If the defendant is an individual.

The defendant, (name) \_\_\_\_\_, is a citizen of the  
State of (name) \_\_\_\_\_. Or is a citizen of  
(foreign nation) \_\_\_\_\_.

b. If the defendant is a corporation.

The defendant, (name) WARNER MUSIC GROUP, is incorporated under  
the laws of the State of (name) \_\_\_\_\_, and has its principal  
place of business in the State of (name) \_\_\_\_\_.

Or is incorporated under the laws of (foreign nation) \_\_\_\_\_,  
and has its principal place of business in (name) \_\_\_\_\_.

*(If more than one defendant is named in the complaint, attach an additional page  
providing the same information for each additional defendant.)*

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## 3. The Amount in Controversy.

The amount in controversy-the amount the plaintiff claims the defendant owes or the amount at stake-is more than \$75,000, not counting interest and costs of court, because (*explain*) Attach additional pages if needed:

476 - \$420,000,000.00  
FOUR HUNDRED TWENTY MILLION DOLLARS

## III. STATEMENT OF CLAIM

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

WARNER MUSIC SIGNS MULTIPLE  
ARTISTS AFTER MULTIPLE ROBBERIES  
WITH AMAZON

## IV. RELIEF

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages. Attach additional pages if needed.

## V. CERTIFICATION AND CLOSING

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper

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1 purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation;  
2 (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or  
3 reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so  
4 identified, will likely have evidentiary support after a reasonable opportunity for further  
5 investigation or discovery; and (4) the complaint otherwise complies with the requirements of  
6 Rule 11.

7 I agree to provide the Clerk's Office with any changes to my address where case-related  
8 papers may be served. I understand that my failure to keep a current address on file with the  
9 Clerk's Office may result in the dismissal of my case.

10 Date of signing:

9/12/2023

11 Signature of Plaintiff

Cody Jones

12 Printed Name of Plaintiff

CODY DAUNDINE JONES

13  
14 Date of signing:

15 Signature of Plaintiff

16 Printed Name of Plaintiff

17  
18 Date of signing:

19 Signature of Plaintiff

20 Printed Name of Plaintiff